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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF SECRETARY

EX PARTE

Mr. William F. Caton
Acting Secretary,
Federal Communications Commission
1919 M Street, N.W.
Room 222
Washington, D.C. 20554

Dear Mr. Caton:

Re: CC Docket 93-162

The attached letter was sent today to Paul D'Ari and Claudia Fox. Please associate this letter with the above-referenced docket.

We are submitting two copies of this notice in accordance with Section 1.1206(a)(1) of the Commission's Rules.

Please stamp and return the provided copy to confirm your receipt. Please contact me should you have any questions or require additional information concerning this matter.

Sincerely,

Jay Bennett

Attachment

cc: Paul D'Ari
Claudia Fox

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PACIFIC TELESIS
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May 9, 1996

EX PARTE

Mr. Paul D'Ari
Common Carrier Bureau
Competitive Pricing Division
Federal Communications Commission
Room 518
1919 M Street, N.W.
Washington, D.C. 20554

Dear Mr. D'Ari,

Re: CC Docket No. 93-162, Channel Assignment Control

In its May 3, 1996 ex parte filing, TCG explains its need for channel assignment control with Expanded Interconnection Service ("EIS"). TCG's discussion boils down to one main point. TCG states that the collocator should be able to tell the LEC to connect the DS1 tail circuit (i.e., the LEC special access service that terminates on the end user's premises) to a particular channel leading into the collocator's cage. TCG states that this ability provides two benefits: 1. "[T]he collocator does not have to wait for the LEC to select a channel assignment." 2. "TCG can electronically activate a new circuit for the customer from its distant network control center without having to send a TCG employee to the cage location in order to manually connect the circuit." TCG, p. 2.

Pacific Bell provides TCG and other collocators with this control and these benefits. There are differences between what TCG describes and the way we do this, but the differences do not limit the collocators' control or benefits. Rather, the differences maximize both the collocators' and our efficiency, flexibility, and ability to maintain the integrity of our networks.

TCG states that with "the right way" to provide channel assignment control, "[o]nce a collocation cage is established, the initial connections between the collocator's network and the LEC's network are established by 'hard-wiring' cables between the collocator's multiplexers and the LEC's MDF." TCG, p. 2. As end users for the service are established, the collocator would tell the LEC which channel on the cables is to be connected to the end user's DS1. TCG explains that the collocator would then know that the end user was connected to the correct collocated multiplexer ("MUX"), so that the collocator could deliver the end user's traffic to and from the correct IXC's POP without delay or need to dispatch a technician to the cage.

Rather than connect directly to the collocator's MUX or other equipment, we employ an EIS Point of Termination ("POT") Bay. The EIS POT Bay is the point of demarcation of service between Pacific Bell and the collocator and is located at the physical collocation cage. When the collocator pre-wires its circuits to its side of the EIS POT Bay, we also pre-wire circuits to our side. The collocator tells us where on our side of the EIS POT Bay to terminate each channel. Since the collocator knows which of its equipment (e.g., which MUX) will handle the traffic from each location on the POT Bay, the collocator merely needs to tell us which location corresponds to each end user in order to control the channel assignment.

For instance, assume the collocator pre-wires a circuit from its MUX A to jack #1 on panel X of its side of the POT Bay and pre-wires a circuit from its MUX B to jack #2 on panel Y on its side of the POT Bay. The collocator would tell us to pre-wire circuits at the same points on our side of the POT Bay. When the collocator knows that end user John Doe is ready for DS1 service, the collocator tells us where on our side of the POT Bay to connect the DS1 service. If the collocator designates jack #1 on panel X, this would automatically connect the end user's DS1 service to MUX A for delivery of traffic to the IXC or other designation associated with that MUX. This would be accomplished without delay or dispatch of a technician.

In TCG's example involving DS1 service, we also do not "hard-wire," or otherwise connect, to our Main Distribution Frame ("MDF"). Instead, for termination of high capacity DS1 and DS3 services within our central offices, we use Digital Cross-Connect Systems ("DCS"), or similar equipment.[1] Our DCS electronically switches traffic to our distribution system for delivery to the customer's premises. In addition, our DCS switches the traffic to conditioning equipment (e.g., repeaters), as needed. We would not be able to obtain the quality of service levels required for high capacity services using our MDF, without adding equipment which may not even exist. Using our existing MDFs, we would have to manually design and build the circuits. This would bring more opportunity for failures, which could result in lower service quality and wrong channel assignments.

[1] We terminate only DSO level (up to 64 Kpbs) service on our MDFs.

Using our DCS, we are able to provide TCG and other collocators with the channel assignment control that they seek. When the collocator pre-wires to its side of the EIS POT Bay, we pre-wire from our side of the POT Bay (from the locations designated by the collocator) to our DCS. When we receive a service order from TCG or the end user, we turn up the service from the end user's premises back to the collocator designated location on the POT Bay. As described above, the collocator's ability to designate those locations gives it control over the assignment of channels and the ability to ensure that the end user's traffic goes to the correct collocated equipment for delivery to the proper IXC POP or other designation. If the collocator has pre-wired from its equipment to its side of the POT Bay and tested the circuit in advance,[2] it need not dispatch a technician to hook-up a new end user. The collocator merely needs to tell us where on the POT Bay to make the connection [3]

Channel Assignment Control of Pacific Bell Multiplexed Services

In our discussion above, we address TCG's descriptions and drawings which involve channel assignment control where the collocator does multiplexing, but the LEC does not. In TCG's examples it provides DS3 service to the IXCs' POPs and multiplexes that down to 28 DS1s for delivery to end users. TCG, pp. 1 & 3.

Our collocators also have channel assignment control when they purchase services that we multiplex. When a collocator purchases an EISCC with an attached Pacific Bell multiplexer, the collocator has channel assignment control of the multiplexer. For example, assume a collocator orders a DS3 EISCC which connects the EIS POT Bay to a central office DS3 multiplexer. The collocator controls the channel assignment at the EIS POT Bay for the DS3 EISCC and for the channel assignment for each DS1 circuit attached to the DS3 MUX. The collocator can purchase our DS3 with a MUX and then add end users by designating which port on the MUX is associated with each end user. The MUX then delivers the end user's traffic to the collocator on a specified channel that the collocator manages.[4]

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[2] The EIS POT Bay is a bi-directional test point. For the reasons discussed herein and others, we strongly disagree with TCG's statement that the "POT Bay in fact serves no useful function whatsoever, and therefore it is not surprising that it is simply hardwired in since it does not do anything anyway." TCG, p. 4.

[3] If we were to then mistakenly make the connection at a location other than that identified by the collocator, we would not only have to correct the connection, but under our FCC Tariff No. 128, Section 2.4.5, we also would owe the customer the installation charge associated with the DS1 channel termination.

[4] If the collocator wishes to multiplex one of the DS1 circuits down to DS0, it may do so by subscribing to a DS1 to DS0 central office multiplexer. The collocator then controls the channel assignments of each DS0 connecting to the DS1 multiplexer.

Cooperative Planning

Channel assignments benefit from our use of a cooperative joint-planning process to provide physical collocation and interconnection. We work very closely with the collocator to review its plans and forecasts for each central office in order to help assure that we meet the collocator's expectations. These plans include the timing of preparation of the collocation cage, pulling in of the collocator's fiber optic cable, delivery and placement of the collocator's equipment in its cage, and the installation of Pacific Bell Access Services that terminate at the collocator's cage.[5] The cage and service volume forecasts plus channel assignments for EIS Cross Connects are reviewed and agreed to by both the collocator and us.[6]

During this past week, we contacted some of the TCG employees that we regularly work with about the concerns expressed in TCG's ex parte. None of these TCG employees expressed any concerns about Pacific Bell's channel assignment control procedures.[7] This lack of concern is consistent with our belief that we provide collocators with channel assignment control that provides the benefits they want.

If you wish to discuss this further, please call me.

Jay Bennett
Director of Federal Regulatory Relations

cc: Claudia Fox

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[5] On February 22, 1995, Pacific Bell filed Transmittal 1780 which, among other things, increased the amount of time, from 90 days to 180 days, allowed for the collocator to activate and interconnect its collocation cage and equipment with Pacific Bell Access Services. We increased the interval because some collocators were not meeting their timelines.

[6] The rolling 2-year forecasts are reviewed and agreed to every 6 months.

[7] They also did not express concerns about other aspects of our provision of service, including our installation and repair service quality.